

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

Civil No. 2:22-cv-00293-JRG
(Lead Case)

JURY TRIAL DEMANDED

SAMSUNG'S RESPONSE TO NETLIST'S NOTICE OF JURY VERDICT (DKT. 911)

Samsung submits this response to Netlist's notice of jury verdict in *Netlist, Inc. v. Samsung Elec. Co., Ltd.*, No. 20-cv-993-MCS-ADS (C.D. Cal.) ("CDCA Action") to respond to Netlist's statements that go beyond simply providing notice of supplemental authority. Judgment was entered in the CDCA Action against Samsung on April 7, 2025, CDCA Action, Dkt. 775, but post-trial motions in the CDCA Action have yet to be filed. Under Rule 50(b) and Rule 59, opening briefs would be due May 5, 2025. Samsung continues to dispute that the Joint Development and License Agreement ("JDLA") was properly terminated and informed Netlist in the CDCA Action that "Samsung reserves all rights to seek vacatur or reversal of the judgment once entered, for example through post-trial motions or appeal." CDCA Action, Dkt. 774.

Dated: April 11, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on April 11, 2025. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Francis J. Albert